

Application No.: 10/010,630
Amendment Dated: August 26, 2005
Reply to Office Action of: May 31, 2005

MAT-8198US

Remarks/Arguments:

Claims 4 and 59 have been objected to. These claims have been appropriately amended. Withdrawal of the objection is respectfully requested.

The Substitute Specification has not been entered because the statement as to a lack of new matter was missing. The Substitute Specification is being filed again. The original Substitute Specification was filed to comply with the Examiner's request for a new application with lines double spaced on good quality paper. The Substitute Specification includes no new matter.

The Official Action sets forth a number of rejections. Those rejections are as follows:

1) Claims 1, 3-5, 46-50 and 51 under 35 U.S.C. §103(a) as being unpatentable over Iida (US 6,385,690) and Quinn (US 6,449,617).

2) Claims 6, 17, 20-22, 32, 34, 47, 48, 49, 52-59, 61-65, 67-71, 73-77, and 79-82 under 35 U.S.C. §103(a) as being unpatentable over Otomo (US 2001/0010049) and Quinn (US 6,449,617).

3) Claims 12, 14-16, 18, 23 and 35-39 are rejected under 35 U.S.C. §103(a) as being unpatentable over Otomo and Quinn, and further in view of Carley (US 6,701,345).

4) Claims 19, 24 and 25 are rejected under 35 U.S.C. §103(a) as being unpatentable over Quinn and Otomo and further in view of Koyama (US 5,978,551).

5) Claims 28-31 and 40-43 are rejected under 35 U.S.C. §103(a) as being unpatentable over Quinn and Otomo, and further in view of Yokota (US 6,691,149) and Carley.

6) Claims 26 and 27 are rejected under 35 U.S.C. §103(a) as being unpatentable over Quinn and Otomo, and further in view of Yokota and Fukunaga (US 6,775,023).

7) Claims 44 and 45 are rejected under 35 U.S.C. §103(a) as being unpatentable over Quinn and Otomo, and further in view of Nishigaya (US 5,696,900).

8) Claim 8 is rejected under 35 U.S.C. §103(a) as being unpatentable over Otomo, Quinn, and Yokota.

Each of the above rejections are respectfully traversed for the reasons set forth below.

In the interest of improving the readability of the argument, Applicants' representative will group the pending independent claims into two separate groups as follows:

Group I: Claims 1, 6, 8, 32, 49, and 52-57; and

Group II: Claims 59, 65, 71 and 77.

Regarding Group I, Applicants' representative will first traverse the rejection with respect to claim 1. The remaining independent claims in Group 1, while not identical to Group I, are also patentable for reasons similar to those set forth below with regard to claim 1.

Applicants' invention, as recited by claim 1, includes features which are neither disclosed for suggested by the art of record, namely:

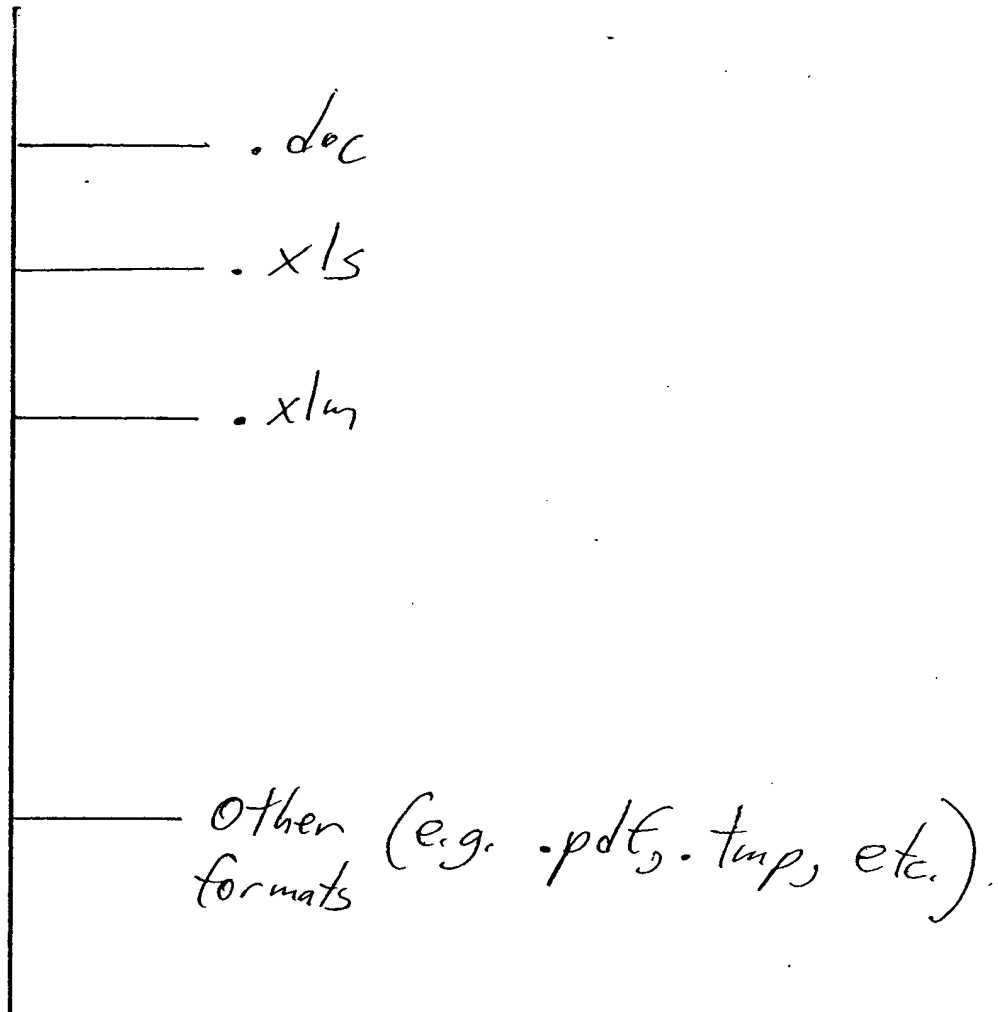
... a plurality of directories at a directory level, each of said directories limited to storing files of a respective one of a plurality of file formats, and

a further directory at said directory level, said further directory for storing files in other than said plurality of file formats ...

Thus, claim 1 is reciting a plurality of directories and a further directory which are all at the same level within a directory (e.g. tree) structure. Of the plurality of directories, each of those directories stores "a respective one of a plurality of file formats. The further directory stores files in formats different than the formats stored in the "plurality of directories."

An exemplary embodiment of the structure is illustrated below:

Directory
Level



The above illustration shows a plurality of directories which each store files of respective formats. Thus, one directory stores files in the .doc format. A second directory stores files in the .xls format. A third directory stores files in the .xml format. A further directory is also shown. The further directory stores files and formats different than the formats stored in the "plurality of directories." The plurality of directories and the further directory are all at the same level within the directory structure.

The Official Action cites a number of references against Applicants' pending claims. Applicants' representative has reviewed all those references and none of those references even come close to the above structure. For example, Iida was cited at column 20 and column 16. Neither column discloses the features as claimed above. Quinn was cited at column 13 for disclosing a plurality of file formats. Applicants' acknowledge that different file formats are known in the art and are not trying to claim different file formats. Instead, claim 1 recites a directory structure that stores different file formats as described above. This is different than the art of record. Otomo, as well, has no disclosure of the above features.

Accordingly, claim 1 is patentable over the art of record.

Again, the other independent claims of Group I are patentable for reasons similar to those set forth above with regard to claim 1.

The claims which depend from the independent claims of Group I are all patentable by virtue of their dependency on allowable independent claims.

Regarding Group II, Applicants representative will first discuss claim 59.

Applicants' claim 59 includes a feature which is neither disclosed nor suggested by the art of record, namely:

... a controller operable to form a directory in the carryable memory media ...
wherein ... if a directory formed by an other apparatus is stored in the carryable memory media and there is not a directory

formed by the apparatus in the carryable memory media, the apparatus makes the carryable memory media form a new directory which is allowed to store an arbitrary file stored in the memory ...

Thus, when, for example, a memory card is moved from a first apparatus to a second apparatus and the second apparatus stores a file in the memory card, the file will be stored in a directory different from any directories created by the first apparatus.

The Official Action has cited Otomo and Quinn against claim 59. Neither Otomo nor Quinn, however, discloses the above feature of a second apparatus storing data in a directory which is different from directories created by the first apparatus.

The remaining independent claims in Group II, while not identical to claim 59, are similarly allowable over the art of record for reasons similar to those set forth above with regard to claim 59.

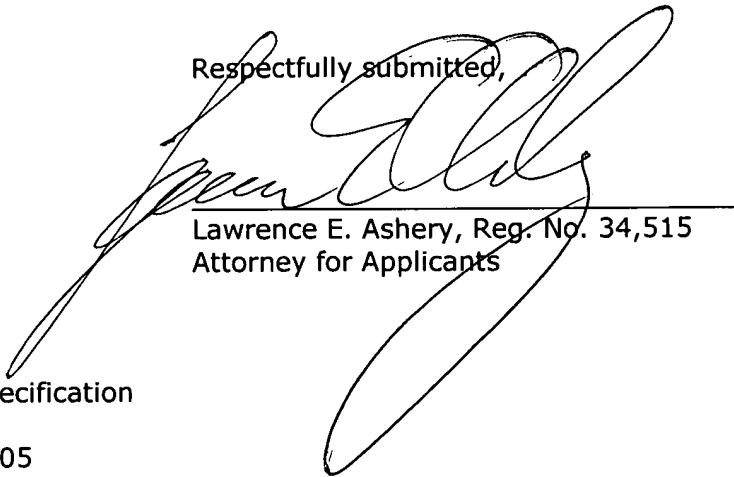
The claims which depend from any of the independent claims in Group II are patentable by virtue of their dependency on allowable independent claims.

Application No.: 10/010,630
Amendment Dated: August 26, 2005
Reply to Office Action of: May 31, 2005

MAT-8198US

In view of the amendments and arguments set forth above, the above identified application is in condition for allowance which action is respectfully requested.

Respectfully submitted,



Lawrence E. Ashery, Reg. No. 34,515
Attorney for Applicants

LEA/fp/ds

Attachments: Substitute Specification

Dated: August 26, 2005

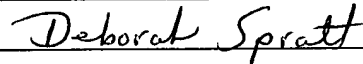
P.O. Box 980
Valley Forge, PA 19482
(610) 407-0700

The Commissioner for Patents is hereby authorized to charge payment to Deposit Account No. **18-0350** of any fees associated with this communication.

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, with sufficient postage, in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on:

August 26, 2005

Deborah Spratt



Deborah Spratt

FP_1:\MAT\8198US\AMEND03.DOC